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9 Attorneys for Plaintiff  
UNITED STATES OF AMERICA

10 UNITED STATES DISTRICT COURT

11 FOR THE CENTRAL DISTRICT OF CALIFORNIA

12 UNITED STATES OF AMERICA,

No. 8:23-CR-00042-CJC

13 Plaintiff,

STIPULATION REGARDING REQUEST FOR  
(1) CONTINUANCE OF TRIAL DATE AND  
(2) FINDINGS OF EXCLUDABLE TIME  
PERIODS PURSUANT TO SPEEDY TRIAL  
ACT

14 v.

15 ANASTASSIA KREZOUB,  
aka "Sylvia Kass,"

**CURRENT TRIAL DATE:**

June 13, 2023

**PROPOSED TRIAL DATE:**

May 28, 2024

16 Defendant.

17  
18  
19 Plaintiff United States of America, by and through its counsel  
20 of record, the United States Attorney for the Central District of  
21 California and Assistant United States Attorney Andrew M. Roach, and  
22 defendant Anastassia Krezoub ("defendant"), both individually and by  
23 and through her counsel of record, Deputy Federal Public Defender  
24 Terra D. Castillo Laughton, hereby stipulate as follows:  
25

26 1. The Indictment in this case was filed on April 18, 2023.  
27 Defendant first appeared before a judicial officer of the court in  
28 which the charges in this case were pending on April 21, 2023. The

1 Speedy Trial Act, 18 U.S.C. § 3161, originally required that the  
2 trial commence on or before June 30, 2023.

3       2. On April 21, 2023, the Court set a trial date of  
4 June 13, 2023, and a pretrial conference date for June 5, 2023, at  
5 9:00 a.m.

6       3. Defendant is detained pending trial. The parties estimate  
7 that the trial in this matter will last approximately four to five  
8 days.

9       4. By this stipulation, defendant moves to continue the trial  
10 date to May 28, 2024 and the pretrial conference to May 20, 2024, at  
11 9:00 a.m. This is the first request for a continuance.

12       5. Defendant requests the continuance based upon the following  
13 facts, which the parties believe demonstrate good cause to support  
14 the appropriate findings under the Speedy Trial Act:

15           a. Defendant is charged with violations of 18 U.S.C.  
16 § 2261A(2)(B), 2261(b)(5) (Stalking) and 18 U.S.C. § 875(d)  
17 (Transmitting Interstate Communications with Intent to Extort). The  
18 government is producing discovery to the defense, including  
19 approximately 7,000 pages of discovery, over a hundred recordings of  
20 defendant, and thousands of text messages spanning defendant's  
21 communications for over a year.

22           b. In light of the foregoing, counsel for defendant also  
23 represents that additional time is necessary to confer with  
24 defendant, conduct and complete an independent investigation of the  
25 case, conduct and complete additional legal research including for  
26 potential pretrial motions, review the discovery and potential  
27 evidence in the case, and prepare for trial in the event that a  
28 pretrial resolution does not occur. Defense counsel represents that

1 failure to grant the continuance would deny her reasonable time  
2 necessary for effective preparation, taking into account the exercise  
3 of due diligence.

4           c. Defendant believes that failure to grant the  
5 continuance will deny her continuity of counsel and adequate  
6 representation.

7           d. The government does not object to the continuance.

8           e. The requested continuance is not based on congestion  
9 of the Court's calendar, lack of diligent preparation on the part of  
10 the attorney for the government or the defense, or failure on the  
11 part of the attorney for the government to obtain available  
12 witnesses.

13         6. For purposes of computing the date under the Speedy Trial  
14 Act by which defendant's trial must commence, the parties agree that  
15 the time period of June 13, 2023 to May 28, 2024, inclusive, should  
16 be excluded pursuant to 18 U.S.C. §§ 3161(h)(7)(A), (h)(7)(B)(i), and  
17 (h)(7)(B)(iv) because the delay results from a continuance granted by  
18 the Court at defendant's request, without government objection, on  
19 the basis of the Court's finding that: (i) the ends of justice served  
20 by the continuance outweigh the best interest of the public and  
21 defendant in a speedy trial; (ii) failure to grant the continuance  
22 would be likely to make a continuation of the proceeding impossible,  
23 or result in a miscarriage of justice; and (iii) failure to grant the  
24 continuance would unreasonably deny defendant continuity of counsel  
25 and would deny defense counsel the reasonable time necessary for  
26 effective preparation, taking into account the exercise of due  
27 diligence.

1       7. Nothing in this stipulation shall preclude a finding that  
2 other provisions of the Speedy Trial Act dictate that additional time  
3 periods be excluded from the period within which trial must commence.  
4 Moreover, the same provisions and/or other provisions of the Speedy  
5 Trial Act may in the future authorize the exclusion of additional  
6 time periods from the period within which trial must commence.

7       IT IS SO STIPULATED.

8       Dated: May 11, 2023

Respectfully submitted,

9                   E. MARTIN ESTRADA  
10                   United States Attorney

11                   ANNAMARTINE SALICK  
12                   Assistant United States Attorney  
13                   Chief, National Security Division

14                   */s/ Andrew M. Roach*

15                   ANDREW M. ROACH  
16                   Assistant United States Attorney

17                   Attorneys for Plaintiff  
18                   UNITED STATES OF AMERICA

19       Dated: May 11, 2023

20                   */s/ with email authorization*

21                   TERRA D. CASTILLO LAUGHTON  
22                   Deputy Federal Public Defender

23                   Attorney for Defendant  
24                   ANASTASSIA KREZOUN

**CERTIFICATION OF DEFENSE COUNSEL**

I am Anastassia Krezoub's attorney. I have carefully discussed every part of this stipulation and the continuance of the trial date with my client. I have fully informed my client of her Speedy Trial rights. To my knowledge, my client understands those rights and agrees to waive them. I believe that my client's decision to give up the right to be brought to trial earlier than May 28, 2024, is an informed and voluntary one.

/s/ with email authorization

May 11, 2023

TERRA D. CASTILLO LAUGHTON  
Deputy Federal Public Defender

Attorney for Defendant  
ANASTASSIA KREZOUB